



U.S. Department of Justice

United States Attorney
Southern District of New York

BY ECF & EMAIL

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application granted. An Order excluding time under the Speedy Trial Act will be separately docketed.

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
July 27, 2021

Re: *United States v. Winston White, a.k.a. "Wins," 7:21-cr-00420 (PMH)*

Dear Judge Halpern:

The above-titled case was recently assigned to the Court. An initial pretrial conference is scheduled for August 3, 2021 at 3 p.m. At the arraignment, which was held on July 16, 2021, Judge McCarthy excluded time through July 30, 2021. However, the parties understand that August 3, 2021 is the first available date for an initial pretrial conference.

The Government respectfully requests, with the consent of defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today through the date of the initial pretrial conference on August 3, 2021. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it would allow the Government to commence the production of discovery in this matter, and would further allow defense counsel to begin review of discovery and evaluate any potential motion practice. The proposed exclusion of time would also allow the Government and defense counsel to engage in discussions regarding a potential resolution of the matter without the need for trial.

The Government respectfully encloses a proposed order excluding time for the Court's consideration.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/ Stephanie Simon
Stephanie Simon
Assistant United States Attorney
Tel: (914) 993-1920

Cc: Patrick Joyce, Esq.